

1 The Honorable Ricardo S. Martinez
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE
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11 CNA INSURANCE COMPANY LIMITED,
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13 Plaintiff,

14 v.
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16 EXPEDITORS INTERNATIONAL OF
17 WASHINGTON, INC. d/b/a EXPEDITORS
18 INTERNATIONAL OCEAN, and DOE I,
19

20 Defendants.

21 No. 2:18-cv-00932-RSM
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23 PARTIES' JOINT MOTION TO
24 CONTINUE DEADLINES FOR
25 SUBMISSION OF PRE-TRIAL FILINGS
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Note for Motion: October 13, 2020

1 COME NOW the parties, and hereby stipulate and jointly move the Court, pursuant to
2 LCR 16(b)(6), to extend the deadlines for the parties' submission of a proposed pre-trial order,
3 trial briefs, and any other pre-trial filings not yet exchanged or submitted until 30 days before the
4 Court reschedules the trial date.
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6 This admiralty matter addresses plaintiff subrogated insurer's claims against defendant
7 non-vessel operating common carrier for cargo allegedly damaged during ocean transit. Trial
8 was scheduled to commence on November 2, 2020. Dkt. 57. By its General Order 15-20 dated
9 October 2, 2020, the Court continued all civil trials scheduled to commence before January 1,
10 2021 pending the Court's issuance of another general order. The parties are unable to agree to a
11 trial by remote video conferencing.
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13 The Court may extend the case scheduling dates for good cause. LCR 16(b)(6). The
14 parties submit that good cause exists to extend the deadlines for pre-trial submissions so as to
15 avoid their expenditure of financial and other resources during the pandemic, when such
16 resources are challenged, and when communication with party and non-party witnesses is
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PARTIES' JOINT MOTION TO CONTINUE DEADLINES FOR
SUBMISSION OF PRE-TRIAL FILINGS - 1
Case No. No. 2:18-cv-00932-RSM

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1 difficult. Because trial will not commence for at least several months, the parties and the Court
2 will not experience any detriment to a continuance of pre-trial filings that is commensurate with
3 the new trial date. Accordingly, the parties respectfully request a continuance of the deadlines
4 for remaining pre-trial filings.

5 DATED this 13th day of October, 2020.
6

7 s/ Steven W. Block

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17 s/ James A. Saville, Jr.

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21 *Attorneys for Plaintiff CNA Insurance Company,
Ltd.*

22 ORDER

23 The parties having so stipulated, and the Court finding good cause for entry hereof,
24 NOW, THEREFORE, IT IS HEREBY ORDERED that the deadlines for the parties'
25 submission of a proposed pre-trial order, trial briefs, and any other pre-trial filings not yet
26 exchanged or submitted are hereby

CONTINUED until 30 days before the Court reschedules the trial date.

PARTIES' JOINT MOTION TO CONTINUE DEADLINES FOR
SUBMISSION OF PRE-TRIAL FILINGS - 2
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1 Dated this 14th day of October, 2020.
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5 RICARDO S. MARTINEZ
6 CHIEF UNITED STATES DISTRICT JUDGE
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Presented by:

9 /s Steven W. Block

10 Steven W. Block, WSBA No. 24299

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PARTIES' JOINT MOTION TO CONTINUE DEADLINES FOR
SUBMISSION OF PRE-TRIAL FILINGS - 3
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1 **CERTIFICATE OF SERVICE**

2 I certify that on October 13, 2020, I electronically filed the foregoing document with the
3 Clerk of the Court via CM/ECF which will notify all parties in this matter who are registered with
4 the Court's CM/ECF filing system of such filing.

5 Executed in Seattle, Washington this 13th day of October, 2020.
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7 *s/ Michelle Stark*

8 Michelle Stark, Legal Assistant/Paralegal

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PARTIES' JOINT MOTION TO CONTINUE DEADLINES FOR
SUBMISSION OF PRE-TRIAL FILINGS - 4
Case No. 2:18-cv-00932-RSM

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